

**Regional Water Quality Control Board**

**Central Valley Region**

**Board Meeting - 7/8 June 2012**

**Response to Written Comments for County of Fresno**

**American Avenue Municipal Solid Waste Landfill**

**Fresno County**

**Tentative Waste Discharge Requirements**

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At a public hearing scheduled for 7/8 June 2012, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) will consider adopting waste discharge requirements that revise the existing waste discharge requirements to provide for changes in the monitoring and reporting program, allow for future expansion, allow excavation of an existing unlined waste management unit (Phase I), and implement corrective action. This document contains responses to comments received from interested parties regarding the proposed Order circulated on 6 April 2012. Written comments from interested parties were required by public notice to be submitted to the Central Valley Water Board by noon on 7 May 2012 to receive full consideration. Comments were received by the due date from:

1. County of Fresno

Substantive comments are summarized below, followed by Central Valley Water Board staff responses.

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**COUNTY OF FRESNO**

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**WASTE DISCHARGE REQUIREMENTS**

**COMMENT 3:** Add a new Findings paragraph between Findings 3 (d) and 4 to read:  
“The Discharger proposes to excavate the existing inactive unlined waste management unit (Phase I) and place the excavated waste into a composite lined landfill cell. Excavation of the unlined unit will continue until the entire unlined waste cell is removed. The Discharger proposes to construct a

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composite liner system in the place of the former unlined waste management unit contiguous with existing Phase II and future Phase III modules, once the unlined unit has been excavated and the area is prepared for operations.”

**RESPONSE:**

Language was replaced in Finding 61 to reflect the proposed change:

The Discharger proposes to excavate the existing inactive unlined waste management unit (Phase I) and place the excavated waste into a composite lined landfill cell. Excavation of the unlined unit will continue until all wastes within the unlined waste cell are removed. The Discharger proposes to construct a composite liner system in the place of the former unlined waste management unit contiguous with existing Phase II and future Phase III modules, once the unlined unit has been excavated and the area is prepared for operations.

**COMMENT 4:** Revise Finding No. 4: Phase II, Modules 1-8 are active, not inactive.

**RESPONSE:** Finding No. 4 has been modified as proposed.

**COMMENT 7:** Revise Finding No. 18: “There are 37... supply wells within one mile...” to read: “There are approximately 64... water supply wells within one mile...”

**RESPONSE:** Finding No. 18 has been modified as proposed.

**COMMENT 8:** Revise Finding No. 24: “The existing waste management units are not within a 100-year flood plain based on the Federal Emergency Management Agency’s (FEMA) Flood Insurance Rate Map, Community-Panel Number 06019C 2075F (19 July 2001). However, a portion of the northeast corner of the proposed expansion Phase III area is within a 100-year flood zone (Zone A) according to the FEMA Map.” to read:

“A portion of the northeast corner of the Phase III expansion area is within a 100-year flood zone (Zone A) according to the Federal Emergency Management Agency’s (FEMA) Flood Insurance Rate Map, Community-Panel

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Number 06019C 2075F (19 July 2001); however, with construction of Phase III Modules 1 and the perimeter berm the area is no longer within a 100 year flood zone.”

**RESPONSE:** Finding No. 24 was modified to read: The existing waste management units are not within a 100-year flood plain based on the Federal Emergency Management Agency’s (FEMA) Flood Insurance Rate Map, Community-Panel Number 06019C 2075F (19 July 2001). A portion of the northeast corner of the Phase III expansion area is within a 100-year flood zone (Zone A) according to the FEMA map. The Phase III Module will be protected from flooding by a perimeter berm.

**COMMENT 9:** Revise Finding No. 29: “The first encountered groundwater ranges from about 120 feet to 132 feet below the native ground surface. Groundwater elevations range from 51 feet MSL to 60 feet MSL. The groundwater is unconfined. The depth to groundwater fluctuates seasonally as much as 20 feet.” to read:  
“...The first encountered groundwater ranges from about 112 feet to 140 feet below the native ground surface. Groundwater elevations range from 48 feet MSL to 70 feet MSL. The groundwater is unconfined. The depth to groundwater fluctuates seasonally as much as 10 feet.”

**RESPONSE:** Finding No. 29 has been modified as proposed.

**COMMENT 14:** Revise Discharge Specification B.2.: “The Discharger shall discharge treated wood wastes only to landfill units equipped with a composite liner system and a leachate collection and removal system (i.e., Phase III Modules 1-6, and future modules listed in Finding 5 of this Order)” to read: “(i.e., Phase II Modules 1-8, Phase III Modules 1-6, and future modules listed in Finding 5 of this Order)”

**RESPONSE:** The waiver for treated wood waste issued by the Department of Toxic Substances Control does not require the exact modules to be specified in Discharge Specification B.2. Since treated wood waste can be accepted only in a composite

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lined unit that is not leaking, there is no need to specify modules as all modules of Phase II and III are composite lined.

**COMMENT 15:** Revise Discharge Specification B.7 : “Leachate may be returned only to Modules 1-6 of Phase III and future composite lined modules listed in Finding 5 of this Order in accordance with Standard Discharge Specifications D.2 through D.4 of the SPRRs” to read:

“Leachate may be returned only to Modules 1-8 of Phase II, Modules 1-6 of Phase III, and future composite lined modules listed in Finding 5 of this Order in accordance with Standard Discharge Specifications D.2 through D.4 of the SPRRs.”

**RESPONSE:** Discharge Specification B.7 has been modified to read: Leachate may be returned only to Phase II, Phase III, and future composite lined modules listed in Finding 5 of this Order in accordance with Standard Discharge Specifications D.2 through D.4 of the SPRRs.

**COMMENT 16:** Revise Construction Specification D.5 : “...excavating the waste from the Phase I Area. The Discharger...” to read: “...excavating the waste from the Phase I Area (as described in Findings 4). The Discharger...”

**RESPONSE:** Construction Specification D.5 was modified to read: The Discharger shall submit for review and approval by the Executive Officer a Workplan containing the methodology, scope of work, and a time schedule for excavating the waste from the Phase I Area (as described in Finding 61). The Discharger shall not proceed with excavation of the waste from the Phase I Area until the Workplan has been approved.

### **MONITORING AND REPORTING PROGRAM**

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**COMMENT 17:** A1 of the Monitoring and Reporting Program (MRP): Revise the listing of wells in the current groundwater monitoring network to read as follows:

<u>Zone Unit Being Monitored</u>	<u>Well</u>	<u>Status</u>
	BMW-1,2	Background Saturated
	BMW-3, DMW-16, 17	Reclassified as Background
II & III		Saturated Phase I, II & III
	DMW-6, 10,	Detection Saturated
	DMW-18, 19	Detection Saturated
	DMW-21, 22,23, 24	Detection Saturated
	DMW-2, 4, 8,12, 20, 25	Corrective Action Saturated
		Phase I & II

**RESPONSE:** A1 of the MRP has been modified as proposed.

**COMMENT 18:** Revise A1 of the MRP: “Five-year COCs ...in 2008 and shall be monitored again in **2013.**” To read: “Five-year COCs ...in 2007 and shall be monitored again in **2012** and reported in **2013.**”

**RESPONSE:** A1 of the MRP has been modified as proposed.

**COMMENT 19:** Revise A2 of the MRP: “...beginning again in **2013** (does not include soil-pore gas).” to read: “...beginning again in **2012** (does not include soil-pore gas).”

**RESPONSE:** A2 of the MRP has been modified as proposed.

**COMMENT 20:** Revise A3 of the MRP: “...Table III every five years, beginning again in **2013.**” to read: “...Table III every five years, beginning again in **2012.**”

**RESPONSE:** A3 of the MRP has been modified as proposed.

**COMMENT 21:** Add at the end of Item 5 in the MRP: “In addition to the semi-annual evaluations required in CCR § 20430h, the Discharger shall conduct and submit a

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comprehensive effectiveness evaluation report on a five year reporting interval, which is synchronized with the M&RP pent-annually required sampling and reporting for the expanded COC list in M&RP Table V.”

Note: This statement is from the response (dated January 2012) to RWQCB comments (dated November 2011) on the ROWD to establish a Corrective Action Program (dated October 2010).

**RESPONSE:** Item 5 of the MRP was modified to read:

- a. Effectiveness of Corrective Action
  - 1) Preparation of time series plots for representative waste constituents.
  - 2) Trend analysis for each waste constituent.
  - 3) The need for additional corrective action measures and/or monitoring wells.
  - 4) Submit a comprehensive effectiveness evaluation report every five years; to be submitted with the five year COC analyses.

**COMMENT 22:** Item B.1 of the MRP: Revise the due date from “**1 August , 1 February** “ to read “***31 August, 28 February***”

**COMMENT 23:** Item B.2 of the MRP: Revise the due date from “**1 February** “ to read “**28 February**”

**COMMENT 24:** Item 1 of the MRP: Revise “ ... are due on **1 August** and **1 February**” to read “ ... are due on **31 August** and **28 February**”

**COMMENT 26:** Item 2 of the MRP: Revise “ ... by **1 February**” to read “ ... by **28 February**”

**RESPONSE:** The MRP has been modified as proposed.

**COMMENT 28:** C.6 of the MRP: The point of compliance wells are not listed in the tentative WDRs. Based on the May 2002 Water Quality Protection Standard document and recent Phase III expansion , the following wells are considered point of compliance monitoring locations:

Phase I and II

DMW-6, 10

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Phase II	DMW-18, 19
Phase III	DMW-21, 22, 23
Phase III (future)	DMW-24

**RESPONSE:** C.6 of the MRP: The points of compliance wells do not need to be listed in the MRP as they frequently change, and the monitoring locations are those in the Detection Monitoring Program approved by the Executive Officer.